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MEMO ENDORSED



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November 17, 2022

Via ECF

Hon. Louis L. Stanton, USDJ United States District Court, Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312 Courtroom 21C

> New Wave Lending Group, Inc. v. Sprout Mortgage Asset Trust and Sprout Mortgage, LLC 1:22-cy-06304-LLS

Dear Judge Stanton:

This firm represents, defendants Sprout Mortgage Asset Trust and Sprout Mortgage, LLC (together, "Sprout"), in the above-referenced matter.

Per this Court's order (Doc. # 20), an in-person Rule 16(b) Initial Conference is currently scheduled for November 18, 2022 at 12:00 pm.

The parties continue to engage in good-faith, meaningful settlement discussions and are hopeful that this matter may be fully resolved without the need for further litigation. To that end, the parties seek to conserve their and this Court's time and resources with respect to a Rule 26(f) report and Rule 16(b) initial conference if the case is settled.

By this joint letter application, the parties therefore request, on consent, a 4-week adjournment of the Initial Conference, to December 9, 2022 and for an extension of the parties' time to submit the Rule 26(f) report and proposed scheduling order to December 2, 2022. The parties further humbly seek leave for untimely submission of this application pursuant to the Court's rules.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Forchelli Deegan Terrana LLP By: Nathan R. Jones

cc: Daniel I. Goldberg, Esq. (via ECF)

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Ordered Stanton 11/17/22